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8 **UNITED STATES DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**  
10

11 UNITED STATES OF AMERICA	)	Criminal Case No.08cr0545LAB
12 Plaintiff	)	
13 v.	)	
14 MARICELA GONZALEZ-TREJO (1)	)	NOTICE OF MOTION; MOTION FOR
15 MIGUEL ROMERO-RIOS (2)	)	VIDEOTAPE DEPOSITIONS,
	)	AND RELEASE OF MATERIAL
16 Defendants	)	WITNESSES;
17	)	
18	)	Hearing Date: April 15, 2008
	)	Time: 1:30 p.m.
	)	Court: A
	)	Judge: Hon. Anthony J. Battaglia

19 TO KAREN P. HEWITT, UNITED STATES ATTORNEY, CARLOS ARGUELLO,  
20 ASSISTANT UNITED STATES ATTORNEY, TIMOTHY SCOTT, ATTORNEY FOR  
21 DEFENDANT, MARICELA GONZALEZ-TREJO, AND MICHELLE BETANCOURT,  
22 ATTORNEY FOR DEFENDANT, MIGUEL ROMERO RIOS.

23 PLEASE TAKE NOTICE that on April 15, 2008, at 1:30 P.m., counsel will move this  
24 court for an order to take the depositions of the material witnesses, LUIS ALBERTO OCHOA-  
25 CASTILLO, and G.C-G.(minor)

26 **MOTION**  
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1 LUIS ALBERTO OCHOA-CASTILLO, and G.C-G.(minor), through thier counsel,  
2 CIRO HERNANDEZ, and pursuant to Fed. R. Crim. P. Rule 15, 8 U.S.C Section 1324 (d) , 18  
3 U.S.C. Section 3144, and 18 U.S.C. Section 3142, hereby moves this court for an order to take  
4 their depositions by videotape.

5 This motion is based upon the accompanying points and authorities, the records in the  
6 above-entitled case and all matters submitted to the court prior to the determination of this  
7 motion.

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9 Dated: March 25, 2008

/S/ Ciro Hernandez  
CIRO HERNANDEZ  
Attorney for material witnesses